

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

SCANSOFT, INC.

Plaintiff,

V.

VOICE SIGNAL TECHNOLOGIES, INC.,
LAURENCE S. GILLICK, ROBERT S.
ROTH, JONATHAN P. YAMRON, and
MANFRED G. GRABHERR

Defendants.

Civil Action No. 04-10353 PBS

ORAL ARGUMENT REQUESTED

**SCANSOFT'S EMERGENCY MOTION TO SHOW CAUSE
WHY DEFENDANT SHOULD NOT BE HELD IN CONTEMPT**

ScanSoft, Inc. (“ScanSoft”) brings this emergency motion under Federal Rule of Civil Procedure 37(b)(2)(D) because defendant Voice Signal Technologies, Inc. (“VST”) has steadfastly refused to comply with this Court’s repeated Orders to produce trade secrets documentation. As discussed in greater detail in the accompanying Memorandum of Law, VST has continuously flouted this Court’s Orders and should not be permitted to continue its egregious conduct.

Accordingly, ScanSoft respectfully requests that this Court grant its Emergency Motion and (i) order VST to answer why it should not be held in contempt, (ii) compel the production of the requested documents, and (iii) award ScanSoft attorneys fees, costs, and expenses incurred in preparing this motion.

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1

I hereby certify that counsel for the parties have conferred in a good faith effort to resolve or narrow the issues raised in this Motion pursuant to Local Rule 7.1(a)(2) on April 29, 2005. No agreement was reached.

Dated: April 29, 2005

SCANSOFT, INC.
By its attorneys,

/s/ Jack C. Schecter

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